

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

PETITION OF CITIZENS COMMUNICATIONS FOR WAIVER OF SECTION 52.33(a) OF THE COMMISSION’S RULES)))	CC Docket 95-116 CCB/CPD No. 01-16
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REPLY COMMENTS

The local exchange affiliates of Citizens Communications Company (“Citizens”), by counsel, respectfully submit these reply comments in the above-captioned proceeding.

Significantly, no comments were filed in opposition to Citizens’ Petition. More significantly, Joint Comments in support of Citizens’ Petition were filed by the National Exchange Carrier Association (NECA), the National Rural Telecom Association (NRTA), the National Telephone Cooperative Association (NTCA), the Organization for the Promotion and Advancement of Small Telephone Companies (OPASTCO), TDS Telecom, and the United States Telecom Association (USTA). ALLTEL also filed comments in support of Citizens’ petition. These companies and associations, which represent a broad spectrum of the telecommunications industry in the United States, note that many companies, especially small, rural telephone companies, confront the same difficulties as Citizens in recovering LNP costs.¹

This demonstrates the magnitude of the cost-recovery issues faced by non-LNP capable carriers and the need for waivers to be granted to enable these carriers to recover the costs of

¹ Joint Comments at 2. ALLTEL Comments at 3.

providing service – costs that arise directly from implementation of LNP as required by the Commission.

Citizens therefore respectfully urges the Commission to act promptly and to grant its Petition and other pending petitions seeking waivers aimed at addressing the same cost-recovery issues as identified by Citizens.

Respectfully submitted,

Citizens Communications Company

By: /s/ John B. Adams
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August 21, 2001

CERTIFICATE OF SERVICE

I, Naomi Adams, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing "Reply Comments" was served on this 21th day of August 2001, by hand delivery or by first class, U.S. Mail, postage prepaid to the following parties:

/s/ Naomi Adams

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